

Appl. No. 09/540,614  
Amdt. Dated 09/28/2004  
Reply to Office Action of August 11, 2004

### REMARKS/ARGUMENTS

This Application is in response to an Office action dated August 11, 2004. In the Office Action, claims 1-23 were rejected under 35 U.S.C. §102(b) as being anticipated by Ishac (U.S. Patent No. 5,812,861). Applicant respectfully traverses the rejection.

Claims 1-23 were rejected under 35 U.S.C. §102(b) as being anticipated by Ishac. Applicant respectfully submits that a *prima facie* case of anticipation has not been established because Ishac fails to teach each and every element set forth in independent claims 1, 9, 14 and 18. As the Examiner is aware, “[a] claim is anticipate *only if each and every* element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *See Verdegaa Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987) (Emphasis added). Applicant respectfully requests reconsideration of the §102(b) rejection.

With respect to claim 1, Applicant respectfully submits that the operation of “preventing modification of a representative of a primary pass-phrase...permitting access to stored information...” is not described in Ishac. Rather, Ishac describes the use of an indicator (325), which enables a die to be placed in a powerdown mode independently from the value of the external powerdown signal (PWD#). For example, if the indicator (325) is set, an OVER-RIDE signal from override circuitry (320) will cause powerdown controller (310) to ignore any powerup command from the external powerdown signal (PWD#). When the indicator (325) is not set, however, the OVER-RIDE signal will not cause powerdown controller (310) to ignore the powerup command. *See Column 6, line 18 et seq. of Ishac*. Such teachings are distinct and unrelated to preventing modification of a representation of a primary pass-phrase, which is a series of bits originating from a string of inputted alphanumeric characters, voice patterns and the like. *See Page 5, lines 2-3 of the subject application*.

With respect to claim 9, Applicant respectfully submits that the operations of “enabling access to stored information” and “disabling access to the stored information” are not described in Ishac. Moreover, Applicant further submits that both an override pin and an override disable pin are not described in Ishac. Rather, Ishac describes a powerdown controller (310) that is

Appl. No. 09/540,614  
Amdt. Dated 09/28/2004  
Reply to Office Action of August 11, 2004

adapted to recognize or ignore an external powerdown signal (PWD#) in response to the value of the indicator (325). Such teachings are completely unrelated to controlling access to stored information as claimed.

With respect to claim 14, Applicant respectfully submits that the operations of "enabling placement of an integrated circuit device of an electronic system into an administrator mode upon assertion of an override disable pin of the integrated circuit device, *data stored within the integrated circuit device can be cleared only when the integrated circuit device is placed in the administrator mode.*" Emphasis added. Again, it is noted that Ishac describes a powerdown controller (310) that is adapted to recognize or ignore the external powerdown signal (PWD#) in response based on the value of the indicator (325) and does not describe each and every limitation set forth in independent claim 14.

Therefore, Applicant respectfully requests the Examiner to reconsider the §102(b) rejection, and if the rejection is maintained, to denote what *exact* elements he considers to be the override disable pin, the override pin and the primary pass-phrase. Such exact information may facilitate the prosecution of the subject application.

The undersigned attorney invites the Examiner to contact him at the phone number listed below if further discussion will facilitate prosecution of the subject application.

Appl. No. 09/540,614  
Amdt. Dated 09/28/2004  
Reply to Office Action of August 11, 2004

**Conclusion**

Applicant respectfully believes that all claims are in condition for allowance. Allowance of the pending claims is respectfully requested at the Examiner's earliest convenience.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 09/28/2004

By

  
William W. Schaal

Reg. No. 39,018

Tel.: (714) 557-3800 (Pacific Coast)

12400 Wilshire Boulevard, Seventh Floor  
Los Angeles, California 90025

**CERTIFICATE OF MAILING/TRANSMISSION (37 CFR 1.8A)**

I hereby certify that this correspondence is, on the date shown below, being:

MAILING

FACSIMILE

☐ deposited with the United States Postal Service  
as first class mail in an envelope addressed to:  
Commissioner for Patents, PO Box 1450,  
Alexandria, VA 22313-1450.

☒ transmitted by facsimile to the Patent and  
Trademark Office.

Date: 09/28/2004

  
Susan McFarlane

09/28/2004

Date